

Attorneys for Plaintiff United States of America

IN RE: VOLKSWAGEN “CLEAN DIESEL”
MARKETING, SALES PRACTICES, AND
PRODUCTS LIABILITY LITIGATION

STIPULATION AND QTF GT TO EXTEND DEADLINE TO AMEND COMPLAINT

The Honorable Charles R. Breyer

United States v. Volkswagen AG et al., No 16
Civ. 295 (CRB) (JSC)

1 WHEREAS, on January 4, 2016, the United States filed its complaint (the
2 “Complaint”) against Defendants Volkswagen AG, Volkswagen Group of America, Inc.,
3 Volkswagen Group of America Chattanooga Operations, LLC, Audi AG, Dr. Ing. h.c. F. Porsche
4 AG, and Porsche Cars North America, Inc. (the “Defendants”);

5 WHEREAS, on February 25, 2016, the Court entered Pre-Trial Order No. 9 (Dkt.
6 1252), which, in Paragraph 5(A), permitted Plaintiffs to amend their complaints, add parties,
7 and/or add claims up to and through May 20, 2016;

8 WHEREAS, the Court entered a Stipulation and Order to Extend (1) Deadline To
9 Respond To The United States’ Complaint, and (2) Deadline To Amend Complaints (Dkt. 1399)
10 which extended the deadline for the Plaintiffs (other than the Federal Trade Commission) to amend
11 their complaints, add parties, and/or add claims without leave of Court up to and through June 20,
12 2016;

13 WHEREAS, the Court entered a Stipulation and Order to Extend the Deadline to
14 Amend Complaint (Dkt. 1583), which extended the deadline for the United States to amend its
15 complaint, add parties, and/or add claims without leave of the Court up to and through July 29, 2016;

16 WHEREAS, the United States and the Defendants have agreed to an extension of
17 time until September 15, 2016 for the United States to amend its complaint, add parties, and/or
18 add claims without leave of Court; and

19 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and
20 among the Parties, that the deadline for the United States to amend its complaint, add parties,
21 and/or add claims without leave of Court should be continued to September 15, 2016.

1 Dated: July 28, 2016

Respectfully submitted,

2 By: /s/ Bethany Engel

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10 Dated: July 28, 2016

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6 *Liaison Counsel for the Porsche Defendants.*

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9 * * *

10 PURSUANT TO STIPULATION, IT IS SO ORDERED.

11
12 DATED: July 28, 2016



13 CHARLES R. BREYER
United States District Judge

ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), the filer of this document attests that concurrence in the filing of this document has been obtained from the other signatories above.

Dated: July 28, 2016

/s/ Bethany Engel

Bethany Engel